

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

QUENTIEN ROGERS and  
RONNIE R. PRICE, SR.

§ CIVIL ACTION NO. \_\_\_\_\_

§

§

VS.

§

§

SEACOR MARINE LLC and  
SEACOR OFFSHORE, LLC

§

§

**PLAINTIFFS' ORIGINAL COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COME NOW Plaintiffs Quentien Rogers (“Rogers”) and Ronnie R. Price, Sr. (“Price”) (collectively “Plaintiffs”), complaining of Defendants SEACOR Marine LLC and SEACOR Offshore, LLC (collectively “Seacor”), and, for cause of action, would respectfully show unto this Honorable Court the following:

**I. PARTIES**

1.1 Plaintiff Quentien Rogers, is a U.S. citizen and resident of the state of Louisiana.

1.2 Plaintiff Ronnie R. Price, Sr., is a U.S. citizen and resident of the state of Louisiana.

1.3 Defendant SEACOR Marine LLC, is a foreign limited liability company with its principal place of business in this District, doing business in this District and Division for the purpose of accumulating monetary profit, and may be served with

process through in accordance with Rule 4(h), Fed.R.Civ.P., through its registered agent, National Registered Agents, Inc., 350 N. St. Paul Street, Suite 2900, Dallas, TX 75201-4234.

1.4 Defendant SEACOR Offshore, LLC, is a foreign limited liability company doing business in this District and Division for the purpose of accumulating monetary profit, and may be served with process in accordance with Rule 4(h), Fed.R.Civ.P. at its home office, 7910 Main Street, 2<sup>nd</sup> Floor, Houma, LA 70360.

## **II. JURISDICTION**

2.1 The Court has jurisdiction over the lawsuit under 28 U.S.C. §1333 because the suit involves admiralty and maritime jurisdiction. This case is brought pursuant 28 U.S.C. § 1333 and the general maritime law.

## **III. VENUE**

3.1 Venue is proper in this matter pursuant to the admiralty and maritime laws of the United States, Rule 82 Fed. R. Civ. P.

## **IV. FACTS**

4.1 At all material times hereto, Seacor owned, operated and/or crewed the *Conquest*, the platform supply vessel involved in the incident made the basis of this suit, a vessel operating in navigable waters.

4.2 At all material times hereto, Plaintiffs were employed by Longnecker Properties as riggers, working on the *Conquest*.

4.3 On or about November 29, 2013, Plaintiffs were passengers on the *Conquest* and sustained severe and disabling injuries when the Captain of the *Conquest* collided with another vessel as the vessel was returning from offshore in the Gulf of Mexico.

4.4 The injuries suffered by Plaintiffs were caused by the negligence and/or gross negligence of Seacor, and unseaworthiness of the vessel, in the following particulars, among others:

- (a) failing to take reasonable precautions for the safety of Plaintiffs;
- (b) failing to provide Plaintiffs with safe transportation;
- (c) failing to properly and sufficiently man the vessel; and
- (d) other acts of negligence and/or omissions to be shown at trial herein.

## **V. DAMAGES**

5.1 As a direct and proximate result of Seacor's negligence and/or gross negligence, including that of its captain, Plaintiffs suffered the following injuries and damages, including, but not limited to: (a) mental anguish in the past and future; (b) lost earnings; (c) loss of earning capacity; (d) disfigurement in the past and future; (e)

physical impairment in the past and future; (f) medical expenses in the past and future; (g) physical pain and suffering; (h) punitive damages.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray for judgment against Seacor for: actual damages in an amount exceeding the jurisdictional limits of this Court; prejudgment and postjudgment interest; punitive damages and attorney's fees; costs of suit; and all other relief to which they may be entitled.

Respectfully submitted,

/s/ Marc Evan Kutner

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